

Utah Greater Sage-Grouse Comment Submissions via ePlanning Web Form

Submission ID	Subject	Submission Text
UT-GRSG-I-130204	Sage Grouse comments	<p>To whom it may concern,</p> <p>as both a citizen and a Bilogist who has worked on Sage Grouse recruitment monitoring, I'm writing to strongly urge you NOT to relinquish the General Habitat designation from the 2015 Sage Grouse conservation plan. Taking this habitat away does three major, detrimental things: 1.) It relinquishes a safety buffer for populations within the critical habitat area. 2.) It offers nothing for the lecs that are already inside the General Habitat acreage, and 3.) It puts undo pressure on an already threatened bird in decline.</p> <p>Getting rid of this designated area in the name of focusing more resources on the priority area is equivalent to saying you're going to demolish half the house so that you can focus more on the fire burning the other half down. It's complete foolishness and does not take a 'good faith effort' approach to conservation. Your justification that it will not impact this already declining species because habitat effected by development is required to be replaced is absolute nonsense and reckless. First, fragmentation is the number one problem and this old growth sagebrush habitat cannot simply be replaced. Second, these birds do not simply pick up and utilize new habitat once disturbed. You would know this if you actually cared about what the science has to say. Lek site fidelity is absolute with Sage Grouse. Once their leking grounds are disturbed they are vanquished. Additionally, listening to one Governor's biased opinion over and above your own scientists and Sage Grouse research already in existence, so that you 'need to keep studying the cause of decline' before more conservation actions are taken, is total folly! We know enough to act and that is what happend in 2015. Leave the plan in place as it stands, please! Otherwise, you will continue to jeopardize our public natural heritage and your soul will be held accountable for such grievous sins. I pray you do the right thing today.</p> <p>Sincerley, David Moen</p>
UT-GRSG-I-210782	Test - Keep GHMA	Test - I think BLM should keep GHMA.
UT-GRSG-I-211133	watershed, predators, land use	The stated consideration for protection of GSG includes predator managment. My concern is that many of the predators have already been harmed by lack of water due to drought and human consumption, thus decreasing ideal habitat for GSG, Raptors, small forraging animals, insects. The ecosystem is also harmed by human use, such as cattle grazing and ATV overuse, including residential intrusion as well. Agencies such as BLM, Forest Service and others must consider all these rescources and human use, while keeping in mind that we have harder decisions in consideration of Earth changes and of continued protection of every living thing.
UT-GRSG-I-211234	Test - Jossie DSD	This is a test comment for the system during the open house.
UT-GRSG-I-212751	Undefined	Please see attached for Enefit American Oil's comments on the Utah Greater Sage Grouse Draft Resource Management Plan Amendment and Environmental Impact Statement.
UT-GRSG-I-213149	Utah Chapter, Sierra Club comments	Please consider these comments. If you have any questions please call James Catlin at 801 441-8668.
UT-GRSG-I-214740	Duchesne County Comments	See attached document.
UT-GRSG-I-216361	Opposition to Plan Revisions to Roll-back existing protections	<p>As someone who cares about birds and the places they need, and as a professional biologist who spent their entire 35+ year career in conservation science, I strongly oppose any efforts to weaken the conservation protections in the Bureau of Land Management's (BLM) sage-grouse land management plans. These birds are part of an iconic western ecosystem, the sagebrush habitat, which supports over 350 species including Golden Eagles and mule deer. They are an important part of our heritage.</p> <p>In 2010, the U.S. Fish and Wildlife Service (FWS) determined that the Greater Sage-Grouse populations were in serious trouble and warranted protection under the Endangered Species Act (ESA).</p> <p>An unprecedented numbers of stakeholders across the West worked for many years on ensuring that sage-grouse management is based on science and good for our local economies. The plans that were agreed to in 2015 led the FWS to reverse its 2010 decision and find the future for sage-grouse was secure: a historic victory for conservation and for collaboration.</p> <p>Instead of amending the plans by weakening protections, pointedly prioritizing oil and gas development over protected species, BLM should focus on engaging</p>

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		<p>communities in the decisions necessary to implement the plans as they are. Give the plans a chance to work. The recently issues Instruction Memoranda generally retreat from the protections set out in previous guidance to field staff in 2016. The first IM, issued in December 2017, reverses existing policy, directing BLM field offices to prioritize oil and natural gas leasing and drilling projects outside of the most sensitive sage grouse habitat. Instead, it states that BLM “does not need to lease and develop outside of [grouse] habitat management areas before considering any leasing and development within [grouse] habitat.” The second IM, issued in January 2018, eliminates requirements for public notice and comment “when conditions worsen and there is a need for action” under adaptive management provisions in the grouse plans. It also shortens the public protest period for oil and gas lease sale parcels to 10 days from 30 days</p> <p>If there are any changes that experts deem necessary, these should instead be done via minor plan amendments, also known as “maintenance actions.” A complete rewrite is an unnecessary waste of federal resources, and risks upending the official finding made by the FWS that a listing under the ESA is not needed.</p> <p>These federal management plans must keep key elements that biologists believe are necessary to avoid the need for listing the species under the ESA. Specifically:</p> <p>Development on existing leases should be managed per regulations that are currently in place, which limit surface occupancy and disturbance. Years of research leave no doubt that sage-grouse do not do well in close proximity to energy development. More development in the most important habitat will not help conserve the species.</p> <p>Good mitigation policy and practice is one of the best opportunities to achieve sustainable development and conservation goals. Where impacts cannot be avoided or minimized, well-designed compensatory mitigation programs can achieve the multiple-use, sustained yield objectives.</p> <p>Do not strip the fundamental mitigation goal of “net conservation gain” from the plans. A no net loss of habitat merely prevents additional habitat loss and is not adequate to achieve long-term conservation of sage-grouse.</p> <p>Improve plan monitoring and oversight, including providing training to field staff and the necessary incentives to ensure proper implementation. The plans should contain metrics by which conservation success can be measured. Conservation metrics will help in effective management of the habitat and reduce wasting personnel time and limited funds.</p> <p>The plans contain many new provisions that serve as loopholes and exceptions to habitat protections. We need certainty that crucial habitat will be protected to ensure the species thrives into the future. If the revisions are adopted, thousands of wells could move into the species core habitats, potentially leading to a listing of the species as endangered</p> <p>Thank you for considering my comments.</p>
UT-GRSG-I-216882	Do Not Tamper With Vital Sage Grouse Conservation Plan	<p>I urge you to uphold the Bureau of Land Management plan amendments developed in 2015, so vitally necessary to protect the Sage Grouse and its home ecosystem. These amendments represent the most conservative possible conclusions about the survival of this precious animal, from the unavoidable scientific realities of its dire conservation status.</p> <p>The current Secretary of Interior is immorally requesting that the Bureau of Land Management abdicate its moral and legal responsibility to the Sage Grouse, to facilitate both their outlandish obsession with fossil fuel extraction, and their alliance with hostile local political and commercial interests. The BLM has delayed for years the necessary policies to protect the remaining Sage Grouse habitat, allowing its populations to retreat catastrophically before hydrocarbon extraction, groundwater mining, and cattle grazing. The Sage Grouse is out of time and out of space, and BLM must uphold these plan amendments to prevent the functional extinction of this keystone species of western semi-arid ecosystems.</p> <p>Unambiguous biological evidence indicates a future of extirpation if BLM abandons these plan revisions and opt to condone continued destruction of the sagebrush ecosystem. The very mild and minor inconveniences suffered by the fossil developers and ranchers operating in the habitat of Sage Grouse, which has lived in America for eons before any humans or drilling rigs set foot here, are astoundingly petty and do not warrant any concern from the BLM. The Sage Grouse has already been forced to compromise, concede, and yield the majority of its rightful home to cattle grazers and energy developers, and it cannot survive any more violence by the industries demanding further BLM privileges. This precious animal has already been stripped of the large majority of its</p>

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		<p>ancestral home, in violation of its biological rights as a denizen of this Earth.</p> <p>The BLM must not allow human disturbance such as oil and gas drilling, power lines, and excessive cattle grazing that reduces the vegetation cover below what these animals require. The BLM has, for decades, found ways to evade and obfuscate its mandate to maintain viable and widespread populations of the Sage Grouse and other wildlife, rolling under a pseudo-legalistic rug each successive geographic and demographic vanquishing of the Sage Grouse. Over the long saga of this species, each year has brought further population losses, with precious little acknowledgement by the BLM of this cumulative loss over time. Ultimately, the BLM must face the cold and plain reality that certain “no” decisions must be issued to those interests and parties wishing to appropriate the resources upon which the Sage Grouse relies. These include withdrawing sage grouse habitat from mining, from oil and gas drilling, from groundwater extraction, and from the invasive leveling of sagebrush and other woody semi-arid vegetation in service of cattle grazers.</p> <p>Excessive grazing in particular has dramatically altered the vegetation community of semi-arid habitats through the Great Basin, for very little economic value in the forage utilized, representing a gross failure by the BLM to roughly balance the marginal values of competing uses. As a former resident of Utah and New Mexico, I was astounded by the willingness of the BLM to strip vast areas of desert, sagebrush, and semi-arid grassland of their very thin vegetation cover for an extremely meager biomass volume of livestock feed, supplementing the diet of an extremely small number of cattle for a correspondingly minute number of ranchers. If the BLM is to uphold their mandate to provide an equitable and reasonable balance of values to the American people, it must protect these precious ecosystems and the Sage Grouse that lives among them, not strip them for the piddling bit of livestock-palatable biomass that provides their physical scaffolding. The Sage Grouse, from this time forward, must enjoy first right to the vegetation of these sparse habitats, not biologically foreign human livestock.</p> <p>If the BLM cannot or will not make the tough but necessary decisions to prioritize the survival of the Sage Grouse, then the Fish and Wildlife Service will be obligated to list this animal as Threatened or Endangered. The burden of proof and efficacy now falls upon BLM to fulfill its legal responsibilities to the Sage Grouse, or have those responsibilities stripped and delegated instead to the jurisdiction of the Endangered Species Act, which its current demographic status would already rightfully justify. BLM has already been shown extraordinary generosity and patience in being allowed years of delay and forbearance from the stricter provisions of the ESA. You must not squander this final opportunity to properly value western America’s semi-arid ecosystems.</p> <p>I urge you to allow BLM staff to maintain the Sage Grouse and its ecosystem as you are morally and legally obligated to do. If you forfeit this precious realm of America’s biological heritage for the self-interested, parochial, superficial demands of resource extraction and its political boosters, our children will not forgive you.</p>
UT-GRSG-I-217432	J.R. Simplot Comments on Draft Utah RMPA/EIS	The attached comments are on behalf of the J.R. Simplot Company regarding the Draft RMPA.
UT-GRSG-I-218758	Strengthen Protections for Sage-Grouse -- 2018 Utah Greater Sage-Grouse Draft Resource Management Plan/Environmental Impact Statement	Please see attached comments.
UT-GRSG-I-218890	Comments from The Pew Charitable Trusts	Attached please find comments from The Pew Charitable Trusts on the draft environmental impact statement proposing changes to the Bureau of Land Management’s (BLM) 2015 sage-grouse plan in seven Utah.
UT-GRSG-I-218906	Greater Sage-Grouse Conservation Plan	<p>July 31, 2018</p> <p>Dear Forest Service, BLM, and other stakeholders,</p> <p>The priority of the Sage-Grouse Conservation Plan is to conserve an iconic bird species and the habitat it depends upon for its survival in the West. The major emphasis of this plan is conservation, not economic development. Although, if wildlife conservation could dovetail with economic development, this plan could have beneficial impacts for the birds as well as local communities. This plan was created to protect the birds without necessitating Endangered Species Act</p>

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		Sincerely, LeeAnn Bennett
UT-GRSG-I-218932	need for specific untrigger language for Sheeprocks	Because the hard trigger in the Sheeprocks has already been tripped, changing some GHMA to PHMA, it would be useful to include specific language on what an “untrigger” would do in this area in terms of allocations or management actions, since it seems unhelpful to return to GHMA if all other GHMA has been eliminated. This comment comes from discussion at the West Desert Adaptive Resource Management Group.
UT-GRSG-I-218987	Solid Non-energy Leasable Minerals	<p>Section 3.15.2 states “Information related to mineral potential has generally not changed since completion of the 2015 Final EIS and can be found in Section 3.21.2 on page 3-208.” Aside from the fact that the statement is false, the information in the 2015 Final EIS is wholly inadequate. The Bureau of Land Management obviously did not for, the 2015 Final EIS nor for this Document, contact its own customers who hold leases and prospecting permits for phosphate. Phosphate has been mined in the Uintah County since 1960; the mine is currently operated by J R Simplot. J R Simplot currently holds three Preference Right Phosphate Leases and another Phosphate Fringe Non Competitive Lease adjacent to its mine. These leases as well as several Phosphate Prospecting Permits held by Utah Mineral Resources LLD, are all within one of the “Primary Habitat Management Areas” from which mining will be disallowed according to the 2015 Final EIS as well as this document. Adjacent to the mine, leases and prospecting permits are mineral lands held by the Utah School and Institutional Trust Lands Administration (SITLA). The SITLA lands are also leased for Phosphate.</p> <p>In 2014 the SITLA lands were drilled and explored for phosphate, the lessee, Utah Mineral Resources (UMR) spent in excess of \$1,000,000.00 on their Diamond Mountain Phosphate Project. The results were a measured and indicated phosphate resource of 26.8 million tons and inferred resources of 23.1 million tons with estimated grade of near 20%. The Adjacent lands where UMR holds the prospecting permits have indicated resources of 7.1 million tons and inferred resources of 4 million tons. With implementation of this Plan Amendment the Prospecting Permits and likely any chance of a phosphate mine on the SITLA leases will likely have to be abandoned along with royalty payments to the School Trust of over \$40 million.</p> <p>Phosphorus is the second most widely used fertilizer nutrient after nitrogen. Fertilizers account for more than 90% of total phosphate consumption in particular cereals (grains) which are estimated to account for 55% of fertilizer use worldwide. With the continuing decrease of farmable land in the world phosphate production will take an ever increasingly important role in order to feed the world population. Removing potentially important resources without any consideration other than its location within the habitat of a “game bird” is unwise. Where does it end? What will be the next species that is deemed critical, threatened or endangered that will take out the next large swath of land that will no longer allow production of needed resources?</p> <p>The 2015 and the Utah Greater Sage-Grouse Resource Plan Amendment and Environmental Impact Statement inadequately addresses Solid Non-energy Leasable Minerals.</p>
UT-GRSG-I-219030	VWVP et al. 2018 comments	The attached comments are being submitted in response to the Bureau of Land Management’s Utah Greater Sage-Grouse Draft Resource Management Plan Amendment (DRMPA) and Draft Environmental Impact Statement (DEIS). The following comments are being submitted on behalf of the members of Western Watersheds Project, Prairie Hills Audubon Society, Center for Biological Diversity, Advocates for the West, American Bird Conservancy, WildEarth Guardians, Wild Utah Project and Sierra Club. We incorporate by reference all previous comments, protests, and litigation filings pertaining to any of BLM’s Greater sage-grouse planning efforts.
UT-GRSG-I-219035	Garfield County Utah	Please see Garfield County Utah’s comments attached Brian Bremner (435) 676-1119
UT-GRSG-I-219038	Phosphate Exploration and Mining	<p>Utah Mineral Resources, LLC 447 N 300 W SUITE #3 Kaysville, UT 84037 August 1, 2018</p> <p>These comments to “Utah Greater Sage Grouse Approved RMP Amendment dated September, 2015” Management Action Mineral Resource 15 (MAMR-15) does not allow phosphate (a leasable nonenergy mineral) development on Diamond Mountain, Uintah</p>

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		<p>County, Utah. This plan is identified in MA-SSS-3. Utah Mineral Resources holds active phosphate leases from the State of Utah on Diamond Mountain and had applied for Phosphate Prospecting Permits on adjoining land with private surface rights and Federal mineral rights.</p> <p>These comments provide new information relevant to the EIS and specifically address social and economic resources. It is our position that responsible phosphate exploration and development can take place on Diamond Mountain. Here are our comments which address the social and economic resources of the area:</p> <p>Utah Mineral Resources, LLC (UMR) is a duly registered company in the State of Utah. UMR has active phosphate leases from the State of Utah and a considerable amount of work has been done to define a large phosphate resource. These leases are not in a contiguous block of land and adjacent federal lands are needed to allow future development. UMR has applied for Phosphate Prospecting Permits on the adjoining Federal lands.</p> <ul style="list-style-type: none">-Phosphate is one of three basic components of fertilizer-vitally needed to increase crop yields.-Phosphate production is currently a major component of the economy for the Vernal area.-Active phosphate mining is currently underway by Simplot and these mining operations are progressing toward Diamond Mountain.-State phosphate leases and pending phosphate prospecting permits (private surface and Federal minerals) are held by UMR and cover land which adjoin an active phosphate lease held by Simplot.-State lease payments and production royalties benefit the schools of Utah-More than \$1,000,000 has been spent drilling, coring and testing the phosphate resource on UMR leases.-A Technical Report (compliant to Canadian NI 43-101 requirements) was prepared by Norwest Corporation in October 14, 2014.-This Technical Report states that measured, indicated and inferred in-place phosphate resources covered by State leases are 59.9 million metric tons. It also states that on adjoining Federal land (where prospecting permits are pending) measured, indicated and inferred in-place phosphate resources are 11.1 million metric tons.-The phosphate bed is about 14 feet thick and extends throughout the UMR State lease area as confirmed by drilling. The depth to the phosphate bed ranges from 118.9 to 286.6 feet below the surface and it is approximately 20% P2O5. <p>Successful reclamation for phosphate exploration and mining in the Diamond Mountain area has been proven. Simplot surface mining operations have been re-contoured and re-vegetated. Healthy plant growth provided better and needed winter range for big game animals, including elk.</p> <p>UMR successfully conducted an extensive drilling program on Diamond Mountain. All disturbed areas including drill pads, roads and a lay-down yard were successfully re-vegetated with a seed mix designed to benefit greater sage-grouse. Our understanding is that the Greater Sage-Grouse population increased after the drilling program was completed. We received an Earth Day award for the reclamation work on the project.</p> <p>A very large phosphate resource has been proven - based on limited work done to date. Additional Federal lands are needed to help consolidate the scattered State leases. This resource could be developed to provide good jobs and a basic component of food production. This can be accomplished without a negative impact on the greater sage-grouse population on Diamond Mountain.</p> <p>Sincerely, O. Jay Gatten (801) 725-6920 ojgatten@nae-xploration.com</p>
UT-GRSG-I-219041	American Bird Conservancy Comment Letter	<p>Thank you for the opportunity for American Bird Conservancy to comment on the draft Utah Greater Sage-Grouse Resource Management Plan Amendment and Environmental Impact Statement. American Bird Conservancy has been participating in the region-wide planning initiative since its inception, and we are concerned that the proposed changes to Greater Sage-Grouse conservation plans in Utah and other states have the potential to put the grouse at greater risk and increase the prospect of sagebrush habitat loss.</p> <p>The purpose of this comment is to provide input to ensure that the Greater Sage-Grouse no longer suffers severe population declines and habitat loss. We are concerned about the piecemeal review of a region-wide initiative and the potential for uneven management of Greater Sage-Grouse habitats and populations in each state; there needs to be clear and consistent approaches to grouse management. The needs of the Greater Sage-Grouse do not change from state-to-state, therefore American Bird Conservancy urges for more uniform management across the region.</p> <p>This can be accomplished through incorporating the standards in the conservation checklist which has been attached for your convenience into each of the draft resource management plans. We request that the Bureau withdraw and then revise the draft RMPA/EIS for Utah to include this conservation alternative, not just a No-Action Alternative or a Preferred Management Alignment Alternative.</p>

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		<p>American Bird Conservancy notes there are instances where the Utah plan does not follow the management recommendations of scientists, leaving open the potential for further habitat loss or degradation. American Bird Conservancy further concerned that important processes including mitigation and adaptive management to safeguard against habitat loss are being weakened or eliminated.</p> <p>The first issue we want to highlight is the presence of Sagebrush Focal Area designations and withdrawal recommendations. Utah’s admission of removing designations from 95 percent of the Greater Sage-Grouse population and the recommendation for withdrawal it initially set up for grouse protections is alarming. Under the No-Action Alternative, based on Utah’s 2015 Approve Resource Management, the Bureau would have designated 181,000 acres as SFAs and there would have been recommendations for withdrawal and prioritized for treatments/livestock permits. Now, under Utah’s Preferred Management Alignment Alternative, lands would no longer be designated as SFA and there would be no withdrawals. American Bird Conservancy believes SFAs contribute to achieving conservation outcome, and the management of the SFAs should align with the conservation alternative.</p> <p>Second, the General Habitat Management Areas, or GHMAs, are aspects of the plan we want to bring to your attention. Under the No-Action Alternative, Utah would have 448,600 acres of GHMA. The management of these areas would follow the 2015 Plan Amendment. Lek buffers, required design features, net conservation gain, habitat objectives, and leasing prioritization would be included under the No-Action Alternative, as well. However, in the Preferred Management Alternative, no GHMAs will exist with hopes of directing improvements to Priority Habitat Management Areas (PHMAs). American Bird Conservancy sees the presence of GHMAs management in accordance with the conservation alternative in Utah as a way to protect the Greater Sage-Grouse and its habitat.</p> <p>Third, Utah’s Adaptive Management has been shifted in an unfortunate direction. For the No-Action Alternative, the Bureau would determine the cause of a decline in Greater Sage-Grouse population after management changes have been made. If the area recovers, another plan amendment would be needed to change management. Now under the Preferred Management Alignment Alternative, the Bureau would determine the cause of a decline first then apply a specifically designed response. If the area recovers, the Bureau would return to original management.</p> <p>This alternative also notes that if birds are no longer present, the Bureau would not manage the land as a PHMA anymore. Even though the Bureau prefers the Management Alignment Alternative, American Bird Conservancy finds it reductive because the Bureau is choosing to go back and use the original management of the area even though the original management was not sufficient enough to prevent a population decline in the first place.</p> <p>Instead determining the cause of decline and amending the management plan once the area recovers to prevent further declines, the Bureau wants to maintain what was originally in place. This Preferred Management Alignment Alternative does not create progress and will only continue the cycle of population declines harming the Greater Sage-Grouse species. Following the provided conservation alternative can allow Utah to have a more effective adaptive management standard.</p> <p>Next, the Prioritization of the Mineral Leasing is an issue that American Bird Conservancy wants to be addressed. Under the No-Action Alternative, the Bureau would prioritize oil and gas leasing outside of the PHMAs and GHMAs. This would allow designed habitat areas to be off limits to the harmful impacts of mineral development. The Bureau’s Preferred Management Alignment Alternative does the exact opposite. The Preferred Alternative no longer prioritizes oil and gas leasing outside the PHMAs or GHMAs. Under this alternative, mineral development would be able to invade these protected areas and in turn expose the Greater Sage-Grouse and its habitat to the harmful effects. We believe prioritization should be restored in accordance with conservational alternative to preserve the Greater Sage-Grouse.</p> <p>We would like to highlight the Burial of Transmission Lines, as well. The Bureau would have been required to bury transmission lines unless “not technically feasible” under the No-Action Alternative. Greater Sage-Grouse instinctively steer away from tall structures; it is an innate characteristic of the species. When tall structures, like above transmission lines, are places in its habitat, this interferes with the way species normally functions and causes distress. Unfortunately, the Preferred Management Alignment Alternative allows the possibility for transmission line structures to be placed in amongst sagebrush lands and interfere with the Greater Sage-Grouse populations in Utah.</p> <p>The last issue we want to touch on is the Mitigation Standard. Under the No-Action Alternative, projects must provide a net conservation gain for Greater Sage-Grouse. This alternative would ensure that all efforts create population growth for the Greater Sage-Grouse. But the Preferred Management Alignment</p>

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		<p>Alternative does not ensure the same. The Preferred Management Alignment Alternative says that projects must improve the condition of Greater Sage-Grouse habitat. This alternative says the Bureau must improve the habitat but not improve Greater Sage-Grouse populations. The alternative does not ensure the Bureau is required to maintain the Greater Sage-Grouse population. A net conservation gain promotes a sustainable population and consulting the conservative checklist to further develop the Mitigation Standard can only benefit grouse conservation efforts.</p> <p>Due to weaknesses in the management standards included in the federal plans, adaptive management, including the use of hard triggers, and mitigation using a net conservation benefit standard are necessary to ensure effectiveness and that grouse are being conserved. Recent policy changes to eliminate mitigation requirements on projects effecting federal lands, and changes to the Instructional Memorandum for adaptive management and mitigation, including no longer avoiding leasing oil and gas in priority sage grouse habitat, have eliminated essential safeguards and backstops, and increase the risk of endangerment.</p> <p>The Greater Sage-Grouse conservation plans identify the most important sagebrush habitat, but fall short on avoiding future impacts by not designating reserve areas where no further disturbance to grouse habitat would be allowed. Development and use of priority Sage Grouse habitat is allowed to continue with some important exceptions and limitations, provided that any unavoidable impacts will be mitigated. As a result, the mitigation policy was critically important to ensuring that the Sage Grouse conservation plans are a success.</p>
UT-GRSG-I-219046	Phosphate Prospecting Permit Approval	<p>These comments to “Utah Greater Sage Grouse Approved RMP Amendment dated September, 2015” Management Action Mineral Resource 15 (MAMR-15) does not allow phosphate (a leasable nonenergy mineral) development on Diamond Mountain, Uintah County, Utah. This plan is identified in MA-SSS-3. Strata Minerals is part owner of active phosphate leases from the State of Utah on Diamond Mountain. These comments provide new information relevant to the EIS and specifically address social and economic resources on Diamond Mountain. Here are our comments:</p> <p>Strata Minerals, Inc. (SMI) is a publically traded company listed on the Vancouver, Canada, Stock Exchange. Our name was recently changed to Revival Gold Inc. We provided the money for a drilling program in 2014 to evaluate the phosphate resources on Utah State phosphate leases which are held by Utah Minerals Resources (UMR). SMI spent more than \$1,000,000 and has earned a 51% ownership in the Diamond Mountain Project.</p> <p>Annual payments on 2,431 acres of State leases are currently \$9728. This money plus future royalties benefit Utah school children.</p> <p>Drilling as approved by the Utah Division of Oil, Gas and Mining has identified a phosphate in-place resource of 60 million metric tons. Drill cores indicate that the phosphate rock has a commercial grade of 20% P2O5.</p> <p>Additional lands are needed if the project is to move forward. Utah Mineral Resources has applied for phosphate prospecting permits on adjoining Federal lands and has contacted private land owners.</p> <p>Simplot is successfully mining phosphate and reclaiming land a few miles west of the UMR/SMI State leases. Drilling has not adversely affected greater sage-grouse populations and demonstrated that successful reclamation work can be done. The social and economic benefits of phosphate production should be considered by the RMP of the Bureau of Land Management.</p>
UT-GRSG-I-219047	The Nature Conservancy in Utah's comments on the Utah BLM Greater Sage-Grouse Draft Resource Management Plan Amendment and Environmental Impact Statement	<p>Please see attached for The Nature Conservancy in Utah's comments on the Utah BLM Greater Sage-Grouse Draft Resource Management Plan Amendment and Environmental Impact Statement.</p>
UT-GRSG-I-219048	Sage-Grouse	<p>As someone who cares about birds and the places they need, I strongly oppose any efforts to weaken the conservation protections in the Bureau of Land Management's (BLM) sage-grouse land management plans. These birds are part of an iconic western ecosystem, the sagebrush habitat, which supports over 350 species including Golden Eagles and mule deer. They are an important part of our heritage.</p> <p>In 2010, the U.S. Fish and Wildlife Service (FWS) determined that the Greater Sage-Grouse populations were in serious trouble and warranted protection under the Endangered Species Act (ESA).</p> <p>An unprecedented numbers of stakeholders across the West worked for many years on ensuring that sage-grouse management is based on science and good for our local economies. The plans that were agreed to in 2015 led the FWS to reverse its 2010 decision and find the future for sage-grouse was secure: a</p>

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		<p>historic victory for conservation and for collaboration.</p> <p>Instead of amending the plans by weakening protections, BLM should focus on engaging communities in the decisions necessary to implement the plans as they are. Give the plans a chance to work.</p> <p>If there are any changes that experts deem necessary, these should instead be done via minor plan amendments, also known as “maintenance actions.” A complete rewrite is an unnecessary waste of federal resources, and risks upending the official finding made by the FWS that a listing under the ESA is not needed.</p> <p>These federal management plans must keep key elements that biologists believe are necessary to avoid the need for listing the species under the ESA.</p> <p>Specifically:</p> <ul style="list-style-type: none">* Development on existing leases should be managed per regulations that are currently in place, which limit surface occupancy and disturbance. Years of research leaves no doubt that sage-grouse do not do well in close proximity to energy development. More development in the most important habitat will not help conserve the species.* Good mitigation policy and practice is one of the best opportunities to achieve sustainable development and conservation goals. Where impacts cannot be avoided or minimized, well-designed compensatory mitigation programs can achieve the multiple-use, sustained yield objectives.* Do not strip the fundamental mitigation goal of “net conservation gain” from the plans. A no net loss of habitat merely prevents additional habitat loss and is not adequate to achieve long-term conservation of sage-grouse.* Improve plan monitoring and oversight, including providing training to field staff and the necessary incentives to ensure proper implementation. The plans should contain metrics by which conservation success can be measured. Conservation metrics will help in effective management of the habitat and reduce wasting personnel time and limited funds.* The plans contain many new provisions that serve as loopholes and exceptions to habitat protections. We need certainty that crucial habitat will be protected to ensure the species thrives into the future. <p>Thank you for considering my comments.</p>
UT-GRSG-I-219049	Non-Energy Mineral Leasing in Greater Sage-Grouse Priority Habitat Areas	<p>Development of leasable, non-energy minerals are currently prohibited in areas of greater sage-grouse priority habitat. Non-energy minerals are beneficial to regional economies and developing local resources protects our nation from dependence on foreign minerals. The following are comments relating to the need to keep greater sage-grouse priority habitat open to leasable minerals and locatable minerals.</p> <ol style="list-style-type: none">1. A list of 35 minerals deemed critical to US national security and economy was recently developed. Agricultural minerals (except potash) were not included on the list but play an important role as a foundation for non-energy mineral independence. Three major components of fertilizer are Nitrogen, Phosphorus and Potassium (N P & K). Phosphate rock is the major source of Phosphorus for US agriculture.2. Most of the US demand for phosphate rock is supplied domestically and known resources such as Diamond Mountain should be open to new exploration and mining to assure independence from foreign supply in the future.3. Exploration, resource development and mining provide jobs in rural communities and are a critical economic element in many regions.4. Exploratory drilling has been conducted on State mineral leases in Priority Sage Grouse Habitat on Diamond Mountain. This drilling was scheduled so as not to interfere with greater sage-grouse strutting, mating and brood rearing. Restoration of the drill sites included a seed mix which was beneficial to habitat improvement. Sage grouse populations in the area where drilling occurred in 2014 increased the following year, indicating that there was no negative affect on the population by drilling.5. Exemptions currently exist for energy development in sage grouse habitat and such exemptions should be extended non-energy projects in all greater sage-grouse habitat.6. Several Phosphate Prospecting Permits are pending on lands adjacent to existing Federal Phosphate leases and State mineral leases where exploration and mining are currently permitted. Consideration should be made in the range management plan for new exploration and development of non-energy minerals on lands adjacent to current leases, exploration and mining activities.7. Exploration and development of the phosphate resource at Diamond Mountain began in the 1960’s and these activities have been conducted concurrently with greater sage-grouse habitat improvement.

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		<p>8. Utah Mineral Resources has successfully managed an exploratory drilling program in critical grouse habitat at Diamond Mountain, Utah. This drilling project was conducted on lands with mineral leases through the State of Utah that are adjacent to current BLM phosphate lease lands and lands where there are Pending Phosphate Exploration Permits. This drilling program demonstrated that exploration scheduling can be scheduled at times when grouse are not strutting and nesting. Grouse population observed in the area increased after drilling was concluded. Revegetation of the drill locations and access roads included a seed mix designed to improve grouse habitat. This project clearly demonstrates that phosphate exploration can be successful in areas of sage grouse habitat with minimal impact to the grouse.</p> <p>9. Priority habitat for sage grouse can be developed on other Federal lands. Mitigation measures can be associated with drilling to develop more priority habitat at these other locations when exploration and mining of non-energy minerals is necessary. The following methods of mitigation were successfully implemented with drilling in priority habitat areas (occupied areas identified as “Winter” and “Brood Rearing” habitat) on Diamond Mountain:</p> <p>A. Avoid drilling during strutting (Breeding season is April - June)</p> <p>B. Phase drilling - begin in areas with minimal impact potential</p> <p>C. Avoid wet meadow areas where greater sage-grouse tend to nest</p> <p>D. Locate drill sites with minimal sagebrush</p> <p>E. Locate drill pads near existing roads to minimize the need for new roads</p> <p>F. Reclaim pads with a seed mix beneficial to greater sage-grouse</p>
UT-GRSG-I-219055	Re: 2018 Utah_GRSG_Draft RMPA/EIS	<p>Dear Mr. Bahr,</p> <p>This comment contains 150 comments from individual citizens and members of The Wilderness Society in state (please see the attached PDF with comments). The comments support keeping the core commitments of the plans intact. We expect the BLM will read and count these comments.</p> <p>Thank you,</p> <p>Kim Stevens</p> <p>The Wilderness Society</p>
UT-GRSG-I-219066	Re: 2018 Utah_GRSG_Draft RMPA/EIS	<p>Dear Mr. Bahr,</p> <p>This comment contains 4,326 comments from individual citizens and members of The Wilderness Society nationally (please see the two attached PDFs with comments, posted as two comments here). The comments support keeping the core commitments of the plans intact. We expect the BLM will read and count these comments.</p> <p>Thank you,</p> <p>Kim Stevens</p> <p>The Wilderness Society</p>
UT-GRSG-I-219074	Comments of AEMA	Attached are the comments of the American Exploration & Mining Association
UT-GRSG-I-219089	TWS et al. comments	Attached
UT-GRSG-I-219089	Exhibit 2	Attached
UT-GRSG-I-219089	Exhibit 3	Attached
UT-GRSG-I-219092	TWS et al. comments supplement	This is Exhibit 4 to our comments which was not included on the full comments I sent earlier.

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UT-GRSG-I-219104	Simplot Utah 2018 GRSG DEIS Comments	Please see attached comments
UT-GRSG-I-219105	ConocoPhillips	ConocoPhillips
UT-GRSG-I-219112	Re: Greater Sage-Grouse Resource Management Plan Amendments and Environmental Impact Statements	The Pew Charitable Trusts submits the following comments on behalf of 6,390 individuals who submitted them via our website. Pew compiled and is submitting these comments as a service to members of our mailing list, and our submission of others” comments should not be construed as an endorsement of any specific comment. We ask that you consider each of these 6,390 individual comments as the Bureau of Land Management makes decisions about the future of greater sage-grouse habitat conservation.
UT-GRSG-I-219113	Re: Greater Sage-Grouse Resource Management Plan Amendments and Environmental Impact Statements	The Pew Charitable Trusts submits the following comments on behalf of 6,364 individuals who submitted them via our website. Pew compiled and is submitting these comments as a service to members of our mailing list, and our submission of others” comments should not be construed as an endorsement of any specific comment. We ask that you consider each of these 6,364 individual comments as the Bureau of Land Management makes decisions about the future of greater sage-grouse habitat conservation.
UT-GRSG-I-219124	Comments from Pacific Legal Foundation	See attachment.
UT-GRSG-I-219138	Western Energy Alliance Comments on the Draft UT GrSG RMPA	Western Energy Alliance Comments on the Draft UT GrSG RMPA
UT-GRSG-I-219153	Utah GRSG Draft RMPA/EIS - Keep the 2015 Plan	Please implement the 2015 Sage-Grouse Habitat Conservation Plan. This plan is based on best available science coupled with an unprecedented collaborative effort including sportsmen, conservationists, elected officials, industry, local business, ranchers, tribes and scientists. Some of the scientists who worked on this plan spent their entire careers studying sage grouse. The 2015 Plan strikes a balance between economic development and conservation. Among the 11 western states with sage-grouse populations, Utah appears to have the most at-risk populations. Sage-grouse habitat in Utah is the most fragmented habitat in the west with sage-grouse populations terribly at risk. Unfortunately, some of these stronghold sage-grouse populations are located in oil and gas country. The vulnerability of the species within Utah needs to be taken into consideration when looking at the species viability across the country. There are some people who never supported habitat plans for sage-grouse. Revising the 2015 plans provides these people with an opportunity to unravel the effectiveness of these conservation efforts. With catastrophic fires, invasive conversion to cheat grass, development pressure, and oil and gas emphasis, this species is facing tremendous pressure. I believe the 2015 Plan is the last chance we have to maintain what little habitat remains for sage grouse. In summary, Implement the 2015 Plan. Keep oil and gas leasing out of priority sage grouse habitat. Maintain grazing standards. We can have both livestock grazing and sage-grouse through good range management. Maintain sagebrush focal areas and the highest level of protection in priority sage-grouse habitat. Continue to place firefighting priorities in quality sagebrush habitat. We are counting on you to be a good steward of the land.
UT-GRSG-I-219157	2,585 comments	Attached please find 2,585 comments from supporters of the Center for Biological Diversity opposing any weakening of protections for greater sage grouse being proposed in the BLM’s Draft Resource Management Plan Amendment and Draft Environmental Impact Statement for Wyoming, Utah, Oregon, Nevada, Idaho and Colorado. Your close attention is appreciated.
UT-GRSG-I-219158	Please do not weaken sage grouse conservation measures	Please do not weaken sage grouse conservation measures. I strongly support and urge BLM to adopt the “No Action Alternative” in the DEIS to continue current management and to not amend or revise the current RMPs. The BLM’s current 2015 RMP sage grouse measures continue to be reasonable, necessary, and deserving of full implementation. These measures are needed to ensure proper management and conservation of the important sage-steppe ecosystem across the interior West. These measures are compatible with and help fulfill BLM’s FLPMA mandates of managing for balanced multiple uses and ensuring the sustained yield for the future of renewable resources.

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		<p>As you know, after an unprecedented collaborative effort by a wide range of federal, state, and local governments, the Interior and Agriculture Departments in September 2015 finalized historic land use plans to protect habitat for the imperiled sage-grouse and 350 other sagebrush-associated species. These plans were the result of sportsmen, local business owners, elected officials, conservationists, and other stakeholders working together to conserve the sage-grouse, preserve the western way of life, and sustain the West’s outdoor economy. Hundreds of thousands of Americans participated in a public comment process prior to the BLM’s final decisions.</p> <p>The BLM’s current sage-grouse plans are based on the best available science and responsibly balance energy development, recreation, grazing, and other activities on public lands. The proposed major changes to the plans would undermine the progress that has been made to carefully ensure continued productivity of sagebrush habitat and allow for responsible development across the West on lands owned by all Americans.</p> <p>Indeed, after a mere three years, it is obvious that the current planning effort is an industry-driven, crass political attempt to weaken the plans, put narrow and short-term corporate profits ahead of the broad and long-term national interest, and disrespect the massive investment in collaboration that successfully occurred during the previous planning effort. Abandoning the previous collaborative outcomes and disregarding the best science on sage grouse conservation will likely significantly boost the level of public controversy and distrust of BLM as well as create fertile grounds for prolonged litigation and its associated uncertainties and risks. In short, this current planning effort is incredibly premature, wasteful, arbitrary, and foolish.</p> <p>Please adopt the “No Action Alternative” and fully implement the current, science-based sage grouse plans. Please allow the existing sage-grouse collaboration outcomes to continue to work for the people, native species and outdoor economy of the West.</p> <p>Thank you very much for considering my comments.</p> <p>Sincerely, Richard Spotts Saint George Utah</p>